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10 Attorneys for Defendant  
11 AGUSTIN GONZALEZ

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 AGUSTIN GONZALEZ,

19 Defendant.

Case Nos. 3:17-cr-00436-CRB and  
3:19-cr-00002-CRB

**JOINT STIPULATION AND ~~[PROPOSED]~~**  
**ORDER FURTHER CONTINUING**  
**CHANGE OF PLEA HEARING**

Date: October 16, 2019  
Time: 1:30 p.m.  
Ctroom: 6 – 17<sup>th</sup> Floor  
Judge: Hon. Charles R. Breyer

1 This matter is currently set for a change of plea hearing on October 16, 2019 at 1:30 p.m.  
2 The parties are continuing to attempt to resolve this matter short of trial. However, additional time is  
3 needed as the parties are attempting to reach a global resolution that will resolve similar offenses  
4 charged in Alameda County. The government is currently working with the Alameda County  
5 District Attorney's Office to determine whether such an agreement can be reached.

6 Based on the foregoing, the parties jointly request that the change of plea hearing be  
7 continued from October 16, 2019 at 1:30 p.m. to November 20, 2019 at 1:30 p.m. Defense counsel  
8 further request, with no objection by the government, that the Court exclude time from October 16,  
9 2019, through November 20, 2019, for effective preparation by defense counsel. *See* 18 U.S.C. §  
10 3161(h)(7)(B)(iv).

11  
12 **SO STIPULATED:**

13  
14 Dated: October 15, 2019

Respectfully submitted,

15 By: /s/ Jeremy Lateiner  
16 Jeremy Lateiner

17 Attorneys for Defendant  
AGUSTIN GONZALEZ

18  
19 Dated: October 15, 2019

20 By: /s/ Aseem Padukone  
David L. Anderson  
United States Attorney  
Aseem Padukone  
Assistant United States Attorney

**~~PROPOSED~~ ORDER**

Based on the foregoing stipulation by the parties, and good cause appearing,

IT IS HEREBY ORDERED that:

1. The change of plea hearing shall be continued October 16, 2019 at 1:30 p.m. to November 20, 2019 at 1:30 p.m.

2. The time from October 16, 2019 to November 20, 2019 – a total of 35 days – is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv), for effective preparation of counsel.

Dated: October 15, 2019

Respectfully submitted,

By: 

HON. CHARLES R. BREYER  
United States District Court Senior Judge

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/s/ *Jeremy Lateiner*  
 Jeremy Lateiner